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*Attorney for Alexander Roche*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CLARK COUNTY EDUCATION  
ASSOCIATION,

Plaintiff,

vs.

ALEXANDER ROCHE, an individual;

Defendant.

Case No.: 2:22-cv-00964-GMN-DJA

**STIPULATION AND  
[PROPOSED] ORDER FOR  
EXTENSION OF TIME**

**[FIRST REQUEST]**

ALEXANDER ROCHE, an individual;

Counter Claimant,

vs.

CLARK COUNTY EDUCATION  
ASSOCIATION, a labor union and employer;  
CLARK COUNTY STAFF ORGANIZAION,  
a labor union; DOE BUSINESS ENTITIES 1-  
10; JOHN VELLARDITA, Executive Director  
of CCEA, an individual, in his individual and  
official capacities; and DOE INDIVIDUALS 1-  
50.

Counter Defendants.

IT IS HEREBY STIPULATED AND AGREED by and between Defendant / Counter  
Claimant, ALEXANDER ROCHE and Plaintiff / Counter Defendants CLARK COUNTY

1 EDUCATION ASSOCIATION, CLARK COUNTY STAFF ORGANIZATION, and JOHN  
2 VELLARDITA, by and through their undersigned counsel, that Defendant / Counter Claimant  
3 ALEXANDER ROCHE may have additional time within which to respond to Plaintiff /  
4 Counter Defendants' *Special Motion to Dismiss* and *Motion to Dismiss* from Friday August  
5 5, 2022 to **Friday, August 19, 2022**. This is the first request for an extension. Per  
6 Judge Navarro's chambers policies, the Proposed Order is attached herewith as **Exhibit 1**.

7 DATED this 4<sup>th</sup> day of August, 2022

DATED this 4<sup>th</sup> day of August, 2022

8 By: /s/ Robert S. Melcic, Esq.  
9 ROBERT S. MELCIC, ESQ.  
10 Nevada State Bar No. 14923  
11 3315 E. Russell Rd.  
12 Ste. A4-271  
13 Las Vegas, NV 89120  
14 Phone: (702) 526-4235  
15 Clerk: (725) 577-8013  
16 Email: robertmelcic@gmail.com  
17 *Attorney for Alexander Roche*

By: /s/ Daniel Marks, Esq.  
DANIEL MARKS, ESQ.  
Nevada State Bar No. 002003  
610 South Ninth Street  
Las Vegas, Nevada 89101  
Phone: (702) 386-0536  
Fax: (702) 386-6812  
Email: office@danielmarks.net  
*Attorney for Clark County Education  
Association, Clark County Staff Organization,  
and John Vellardita*

15 DATED this 4<sup>th</sup> day of August, 2022

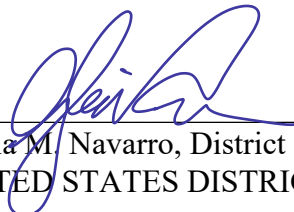
DATED this 4<sup>th</sup> day of August, 2022

17 By: /s/ Steven Sorensen, Esq.  
18 STEVEN SORENSEN, ESQ.  
19 Nevada State Bar No. 15472  
20 4230 McLeod Drive  
21 Las Vegas, Nevada 89121  
22 Phone: (702) 473-1020  
23 Fax: (702) 866-6134  
24 Email: ssorensen@ccea-nv.org  
25 *Attorney for Clark County Education  
Association*

By: /s/ Adam Levine, Esq.  
ADAM LEVINE, ESQ.  
Nevada State Bar No. 004673  
610 South Ninth Street  
Las Vegas, Nevada 89101  
Phone: (702) 386-0536  
Fax: (702) 386-6812  
Email: alevine@danielmarks.net  
*Attorney for Clark County Education  
Association, Clark County Staff Organization,  
and John Vellardita*

26 **IT IS SO ORDERED.**

27 Dated this 6 day of August, 2022.

28   
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT



Law Clerk &lt;rsmlawclerk@gmail.com&gt;

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## Request for extension

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**Law Clerk** <rsmlawclerk@gmail.com>

Thu, Aug 4, 2022 at 8:00 AM

To: Adam Levine &lt;ALevine@danielmarks.net&gt;

Cc: Office &lt;office@danielmarks.net&gt;, Joi Harper &lt;JHarper@danielmarks.net&gt;, Steve Sorensen &lt;ssorensen@ccea-nv.org&gt;, Robert Melcic &lt;robertmelcic@gmail.com&gt;

Good morning,

I forgot that, before filing the SAO, I would need permission to affix your signature. Here is the proposed SAO as a Word Document in case you have any edits.

Please let me know if I may affix your signature to the SAO as drafted.

Thank you,  
Ms. Generaux

[Quoted text hidden]



**22.08.04 Roche.Alexander - Proposed SAO.docx**  
32K



Law Clerk &lt;rsmlawclerk@gmail.com&gt;

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## Request for extension

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**Adam Levine** <ALevine@danielmarks.net>

Thu, Aug 4, 2022 at 8:46 AM

To: Law Clerk &lt;rsmlawclerk@gmail.com&gt;

Cc: Office &lt;office@danielmarks.net&gt;, Joi Harper &lt;JHarper@danielmarks.net&gt;, Steve Sorensen &lt;ssorensen@ccea-nv.org&gt;, Robert Melcic &lt;robertmelcic@gmail.com&gt;

That is fine. You may affix my electronic signature.

Adam Levine, Esq.

Law Office of Daniel Marks

610 S. Ninth Street

Las Vegas, NV 89101

(702) 386-0536: Office

(702) 386-6812: Fax

[alevine@danielmarks.net](mailto:alevine@danielmarks.net)

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**Sent:** Thursday, August 4, 2022 8:00 AM

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**Subject:** Re: Request for extension

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